

Exhibit B
(FILED UNDER
SEAL)

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Feuerstein, Martin - Vol. I February 25, 2019

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SIMO HOLDINGS, INC.,)	
)	
Plaintiff,)	
)	
vs.)	No. 18-cv-5427-(JSR)
)	
HONG KONG UCLOUDLINK NETWORK)	
TECHNOLOGY LIMITED and UCLOUDLINK)	
(AMERICA), LTD.,)	
)	
Defendants.)	

Deposition Upon Oral Examination Of

MARTIN FEUERSTEIN

Volume I

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9:30 a.m.

February 25, 2019

7401 164th Avenue NE

Redmond, Washington

REPORTED BY: Yvonne A. Southworth, CCR No. 2129.

¹ cellular network.

[illegible]

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[REDACTED]

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1 communication circuitry, 518, coupled to one or more
2 wireless radios or transceivers, 540, semicolon, user
3 interface devices 506, comma, like a display, 508,
4 comma, keyboard, 510, comma, speaker, comma, and
5 microphone, 511, parentheses, a self-contained power
6 source, 502, like a battery, comma, coupled to a power
7 management module, 504, comma, and at least one BUS,
8 514, that includes the aforementioned components.

9 Do you see that? My question is very
10 simple, sir. Do you see what I just read?

11 **A I see what you just read, yes.**

12 Q All right. Doesn't that there say that a --
13 it's referring to a plurality of components. So
14 there's at least one processor, a memory, and so on,
15 not two processors, two memories, and so on?

16 MR. ZHU: Objection.

17 **A So I see the same column, line 25 seems to**
18 **be describing this as one embodiment, but there are**
19 **different embodiments and some other embodiments.**

20 Q Right. What it actually says though, sir,
21 the actual quote, not your interpretation, different
22 embodiments may include some or all of these
23 components. Doesn't that indicate, like I said, it
24 could have one processor and a memory, and maybe it
25 doesn't have some of that other stuff. It can have

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1 some or all. That's what it's saying in the
2 specification, clear as day, right?

3 MR. ZHU: Objection.

4 Q Let me rephrase the question. You don't
5 dispute that the patent says different embodiments may
6 include some or all of these components. That's what
7 the patent says, right?

8 A Yes. That's what the patent says.

9 Q All right. And it also -- the section I
10 read just above, it talks about having one processor
11 and a memory, among other things. I give you that.
12 But it's referring to one processor, not two, not
13 three, one. Right?

14 A Okay. Can you repeat the question, please?

15 Q The section I read talks about having one
16 processor and a memory, among other things?

17 A At least one processor.

18 Q Right. It's referring to one, not two, not
19 three, correct?

20 A It's referring to at least one. Such as at
21 least one.

22 Q Right. So it could have one processor,
23 correct?

24 A Yes, it could have one.

25 Q All right. In your opinion, in order to